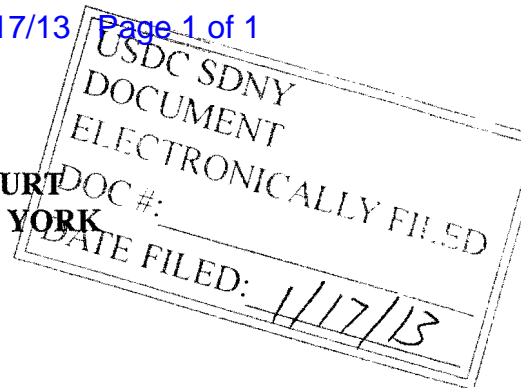


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK



IN RE: TRIBUNE COMPANY FRAUDULENT
CONVEYANCE LITIGATION

Consolidated Multidistrict Action
11 MD 2296 (WHP)

ECF Case

THIS DOCUMENT RELATES TO:
William A. Niese et al. v. A.G. Edwards Inc. et al.
Case No. 1:12-cv-00551-WHP

PLAINTIFFS' NOTICE OF VOLUNTARY DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1), William A. Niese et al., hereby
dismiss this action without prejudice solely against Cheyne Capital Management, Inc. and
Cheyne Capital Management, LLC, which have neither moved nor answered.

Dated: January 15, 2013

Respectfully submitted,

/s/ Jay Teitelbaum

Jay Teitelbaum, Esq.

Teitelbaum & Baskin, LLP

1 Barker Avenue, Third Floor

White Plains, New York 10601

Tel.: (914) 437-7670

Email: jteitelbaum@tblawllp.com

Counsel for Plaintiffs

SO ORDERED:


WILLIAM H. PAULEY III U.S.D.J.

1/16/13